

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

**FRAIN SIMPLIS;**

CASE NO.: 17CV-00183JRH-GRS

**LASHONDRA SIMPLIS**

Plantiffs,

vs.

**U. S. DISTRICT COURT  
Southern District of Ga.  
Filed in Office**

4/15 2017  
TRB  
Deputy Clerk

**JP MORGAN CHASE BANK;**

**TRANSLAND FINANCIAL SERVICES;**

**WASHINGTON MUTUAL BANK;**

**And ALL Persons claiming any interest in real**

**Property located at 864 Southbridge Blvd.;**

**Savannah, Georgia 31405 aka lot 907;**

**and Does 1-20,**

**Defendants**

**OPPOSITION TO MOTION FOR DISMISS**

We, Frain and LaShondra Simplis pro se litigants, are filing this opposition to the motion to dismiss filed by the Defendant JP Morgan Chase. This matter is a genuine issue of material fact as it relates to the defendants and their predecessors intent to illegally foreclose on a property for which they have no rights.

This opposition is based on the fact that neither of the predecessors for this property held legal business licenses in the state of Georgia and in times recent to the date of the loan were considered being revoked in the original state of its operations. These facts are true and binding having submitted previous documents to the court supporting these material facts.

Pleas allow for the development of additional facts in this case and please do not dismiss the case based on the unfounded merits of the defendants. We respectfully submit this opposition to the court as pre, se litigants.

  
Frain Simplis



LaShondra Simplis

Frain and LaShondra Simplis

864 Southbridge Boulevard

Savannah, GA 31405

Kutock Rock, LLP

Atlanta, GA

Submitted via US Mail to Defendants